IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)
BRENNICE S. WARFIELD, 2253 RIVERWAY DRIVE OLD HICKORY, TN 37138 SSN: XXX-XX-2123 Debtor(s).) BK. NO. 3:17-bk-02210 CHAPTER 13 JUDGE MARIAN F, HARRISON))

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: JANUARY 29, 2018. IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: FEBRUARY 20, 2018, 8:30 a.m., Courtroom 1, 2nd Floor Customs House, 701 Broadway, Nashville, TN 37203

NOTICE OF MOTION TO RECONSIDERR ORDER DISALLOWING CLAIM

Debtor has asked the court for the following relief: TO RECONSIDER ORDER DISALLOWING

CLAIM

1. File with the court your written response or objection explaining your position at:

By Mail: US Bankruptcy Court, PO Box 24890, Nashville, TN 37202-4890 US Bankruptcy Court, 701 Broadway, 1st Floor, Nashville, TN (Monday-Friday, 8:00 a.m. - 4:00 p.m.)

- 2. Your response must state that the deadline for filing responses is January 29, 2018, the date of the scheduled hearing is February 20, 2018, and the motion to which you are responding is Motion to Reconsider Order Disallowing Claim. If you want a file stamped copy returned, you must include an extra copy and a self-addressed, stamped envelope.
 - 3. You must also mail a copy of your response to:

J. Michael Combs Attorney at Law 102 Woodmont Boulevard. Suite 200 Nashville, TN 37205

Chapter 13 Trustee P. O. Box 340019 Nashville, TN 37203-0019

U. S. Trustee 318 Customs House 701 Broadway Nashville, TN 37203

If a timely response is filed, the hearing will be held at the time and place indicated above. THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE. You may check whether a timely response has been filed by calling the Clerk's office at 615-736-5584 or viewing the case on the Court's website at <www.tnmb.uscourts.gov>. If you received this notice by mail, you may have three additional days in which to file a timely response under Rule 9006(f) of the Federal Rules of Bankruptcy Procedure.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

DATE: <u>12/28/2017</u>

Signature:

/s/ J. Michael Combs

Name: J. Michael Combs

102 Woodmont Blvd., Suite 200

Nashville, TN 37205 615-255-7448

bk@jmichaelcombs.com

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)
BRENNICE S. WARFIELD, 2253 RIVERWAY DRIVE OLD HICKORY, TN 37138 SSN: XXX-XX-2123 Debtor(s).)

MOTION TO RECONSIDER THE ORDER DISALLOWING CLAIM OF OCWEN LOAN SERVICING, LLC

Comes now the Debtor, by and through the undersigned counsel, and would and would move this Court to set aside the Order disallowing the claim that she filed on behalf of her mortgage company, Ocwen Loan Servicing, LLC, (hereinafter "Ocwen").

In support of this motion Debtor would show that her counsel did receive a correspondence from Ocwen inquiring as to whether or not Debtor's counsel would be willing to file a claim on behalf of Ocwen if sufficient information were provided. Of course counsel responded that he had already filed a claim and could simply amend that if the appropriate information be provided.

The email that Debtor's counsel sent to the counsel for Ocwen indicated that counsel was out and would reply when he or she got back in town. Debtor's counsel has not yet heard anything further from counsel for Ocwen.

However the very fact that Debtor's counsel did receive what appears to be a gratuitous email from counsel for Ocwen gives some hope.

Wherefore, Debtor would respectfully requests that the Order disallowing the claim that she filed on behalf of Ocwen be SET ASIDE.

Respectfully submitted,

/s/ J. Michael Combs

J. MICHAEL COMBS

Attorney for Debtor 102 Woodmont Blvd., Suite 200 Nashville, TN 37205 (615) 255-7448 bk@jmichaelcombs.com

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a copy of the foregoing document to the Chapter 13 Trustee, P. O. Box 340019, Nashville, TN 37203-0019; to the U. S. Trustee, 318 Customs House, 701 Broadway, Nashville, TN 37203; and to all creditors on the attached matrix (10 copies X \$1.00 = \$10.00) on this 28th day of December, 2017.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)
BRENNICE S. WARFIELD, 2253 RIVERWAY DRIVE OLD HICKORY, TN 37138 SSN: XXX-XX-2123 Debtor(s).)

$\frac{ORDER\ RECONSIDERING\ ORDER\ DISALLOWING\ CLAIM\ OF\ OCWEN\ LOAN\ SERVICING,}{LLC}$

It appearing to the Court that this cause came to be heard upon the Debtor's request to reconsider the Order disallowing the claim filed by

And it further appearing that no response to that objection has been filed with this Court.

IT IS, THEREFORE ORDERED, ADJUDGED and DECREED that the Order Disallowing the claim filed by debtor on behalf of Ocwen is set aside.

This order was signed and entered electronically as indicated at the top of the first page.

APPROVED FOR ENTRY:

/s/ J. Michael Combs

J. MICHAEL COMBS
Attorney for Debtor(s)
102 Woodmont Blvd., Suite 200
Nashville, TN 37205
(615) 255-7448
bk@jmichaelcombs.com

BRENNICE S. WARFIELD 2253 RIVERWAY DRIVE OLD HICKORY TN 37138

J. MICHAEL COMBS LAW OFFICE OF J. MICHAEL COMBS 102 WOODMONT BLVD SUITE 200 NASHVILLE, TN 37205

CACH, LLC 4340 S MONACO, 2ND FL DENVER CO 80237

CITI FINANCIAL INC. 872 MADISON SQUARE MADISON TN 37115

OCWEN LOAN SERVICING, LLC PO BOX 24605 ATTN: BANKRUPTCY DEPT WEST PALM BEACH FL 33416-4605

PORTFOLIO RECOVERY P O BOX 12914 NORFOLK VA 23541

SANTANDER CONSUMER USA ATTN: BANKRUPTCY DEPT P. O. BOX 560284 DALLAS TX 75356-0284

SPECIALIZED LOAN SERVICING 8742 LUCENT BLVD, STE 300 HIGHLANDS RANCH CO 80129

THE HOUSING FUND 305 11TH AVE., SO NASHVILLE TN 37203

WATERFORD HOA % SCOTT D. WEISS, ATTY 1900 CHURCH ST., STE 301 NASHVILLE TN 37203